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July 28, 2025

VIA ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

*Re: Arbol Inc. v. HCC Insurance Holdings, Inc. and Scott Klemm (25-CV-01390) –
Notice of Motion to Dismiss*

Dear Judge Torres:

We are counsel to Defendants HCC Insurance Holdings, Inc. (“HCC”) and Scott Klemm (“Mr. Klemm,” collectively with HCC, the “HCC Parties”) in connection with Arbol Inc.’s (“Arbol”) lawsuit filed against the HCC Parties. Pursuant to Your Honor’s Individual Rule III(B)(iv), we write to inform the Court that the HCC Parties plan to file a new motion to dismiss Arbol’s Second Amended Complaint (Dkt. 47). The HCC Parties respectfully request that their motion is due to be filed by August 15, 2025. Further, consistent with Your Honor’s Order regarding the HCC Parties’ prior motion to dismiss (Dkt. 31), the HCC Parties request that the word limit for their opening brief, and Plaintiff’s answering brief, are each extended by 2,000 words, and the word limit for the HCC Parties reply brief is extended by 1,000 words.

Respectfully submitted,
/s/ Mark Temple

Defendants' motion to dismiss, ECF No. 34, is DENIED AS MOOT. By **September 2, 2025**, Defendants shall file their renewed motion. By **September 23**, Plaintiff shall file its response. By **September 30**, Defendants shall file their reply, if any.

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 34.

SO ORDERED.

Dated: July 29, 2025
New York, New York



ANALISA TORRES
United States District Judge